

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re	:	Chapter 11
	:	
PHOENIX SERVICES TOPCO, LLC, <i>et al.</i>,	:	Case No. 22-10906 (MFW)
	:	
Debtors.¹	:	(Jointly Administered)
	:	
	X	Re: Docket No. _____

**ORDER SHORTENING NOTICE AND OBJECTION PERIODS WITH
RESPECT TO DEBTORS' MOTION FOR ENTRY OF AN ORDER
(I) AUTHORIZING THE REJECTION OF CERTAIN EXECUTORY CONTRACT
WITH LATROBE SPECIALTY STEEL COMPANY, (II) AUTHORIZING THE SALE
OF NON-CORE ASSETS AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion to Shorten**”)² of Phoenix Services Topco, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), for entry of an order pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(c)(1), and Local Rules 9006-1(c) and (e), shortening the notice and objection periods with respect to the Rejection and Sale Motion, all as set forth more fully in the Motion to Shorten; and this Court having jurisdiction to consider the Motion to Shorten and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion to Shorten and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Phoenix Services Topco, LLC (4517); Phoenix Services Parent, LLC (8023); Phoenix Services Holdings Corp. (1330); Phoenix Services International LLC (6493); Metal Services LLC (8793); Terracentric Materials LLC (0673); Cool Springs LLC (8687); Metal Services Investment LLC (2924); and Phoenix Receivables, LLC (not applicable). The Debtors’ mailing address is 4 Radnor Corporate Center, Suite 520, 100 Matsonford Road, Radnor, Pennsylvania 19087.

² Capitalized terms used but otherwise not defined herein shall have the meanings set forth in the Motion to Shorten.

Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion to Shorten having been provided under the circumstances; and such notice having been appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion to Shorten; and it appearing that the relief requested in the Motion to Shorten is in the best interests of the Debtors, their estates, creditors, and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is granted to the extent set forth herein.
2. The hearing to consider the relief requested in the Rejection and Sale Motion shall be held on **June 9, 2023 at __: __ .m. (Eastern Time) (the “Hearing”)**.
3. Objections, if any, to the relief requested in the Rejection and Sale Motion shall be filed and served by no later than **one (1) hour prior to the Hearing**.
4. The Debtors are authorized to take all action necessary to effectuate the relief granted in this Order.
5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.